



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

JUN 25 2001

Dr. Gary Zeman
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Berkeley, CA 94720

Reference No. 01-0126

Dear Dr. Zeman:

This is in response to your May 18, 2001 letter concerning packagings prescribed in 49 CFR 173.416 for Class 7 (Radioactive) materials. Specifically, you asked if the outer packaging of a Type B combination packaging with an inner 2R container also meets the definition of an "overpack" under § 171.8.

The answer is no, the outer packaging is not considered to be an overpack. The definition of an overpack in § 171.8 reads "Overpack, except as provided in subpart K of Part 178 of this subchapter, means an enclosure that is used by a single consignor to provide protection or convenience in handling of a package or to consolidate two or more packages. . . ." (Emphasis added). Subpart K contains the manufacturing specifications for Class 7 (radioactive) packagings.

Under § 173.416(d), the term "protective jacket" for a DOT 20WC packaging means a hollow cylindrical shell and lid constructed of one-piece discs and rings made of plywood or solid hardwood, and reinforced with steel rods. It is described and illustrated in § 178.362, and may be equipped with additional features, such as vent holes or a steel shell. Under § 173.416(f), the term "overpack" for a DOT 21WC packaging means two nested plywood boxes within a third wooden box enclosed in a welded metal frame with all outer surfaces painted in intumescent paint. It is described and illustrated in § 178.364. These packagings are considered combination packagings, and must include the specified inner and outer packagings to satisfy the specific packaging provision.

I hope this satisfies your request.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



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173.416

Edmonson
§ 173.416
Packaging
01-0126

May 18, 2001

Memorandum

To: Mr. Edward T. Mazzullo
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U.S. DOT/RSPA (DHM-10)
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Subject: Clarification of Type B Container Outer Containment

In 49 CFR 173.416(f), the 21WC is referred to as an "overpack" for a Type B packaging with an inner 2R specification container. In section 173.416(d), the 20WC is referred to as an "outer jacket". We are requesting clarification for Type B packagings with an inner 2R container as to whether the outer containment (eg. 20WC or 6M) is considered to be an "overpack".